

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

UNITED STATES OF AMERICA

v.

NO. 4:18-CR-274-O

LISA BROWN

FACTUAL RESUME

In support of the Lisa Brown (“Brown”) plea of guilty to the offense in Count One of the indictment, Brown, the defendant, Brook Antonio, the defendant’s attorney, and the United States of America (the government) stipulate and agree to the following:

ELEMENTS OF THE OFFENSE

To prove the offense alleged in Count One of the indictment, charging a violation of 18 U.S.C. § 641, that is, Theft of Government Funds, the government must prove each of the following elements beyond a reasonable doubt:¹

- First.* That the money described in the indictment belonged to the United States government;
- Second* That the defendant embezzled, stole or knowingly converted such money to the defendant’s own use; and
- Third.* That the defendant did so knowing the money was not hers and with the intent to deprive the owner of the use or benefit of the money.

STIPULATED FACTS

¹ Fifth Circuit Pattern Jury Instructions 2.45 (5th Cir. 2015).

1. Brown agrees and stipulates that from in or about May 2015 through in or about June 2018, in the Fort Worth Division of the Northern District of Texas, in a matter within the jurisdiction of the Social Security Administration (“SSA”), a federal department of agency, she did, knowingly and with the intent to deprive the owner of the use and benefit of the money, embezzle, steal and convert to her use money belonging to the SSA, namely Supplemental Security Income (“SSI”) benefits, to which Brown knew she was not entitled to because she was working and the amount of her income would make her ineligible to receive SSI benefits.

2. Brown admits and agrees that she was awarded SSI disability benefits through Title XVI of the Social Security Act, paid by SSA, a department or agency of the United States.

3. Brown admits and agrees that she was notified by SSA that she was to report changes in income such as work activity to SSA because that may make her ineligible to receive such disability benefits.

4. However, Brown admits that, from in or around May 2015 through in or about June 2018, in the Fort Worth Division of the Northern District of Texas, she engaged in work activity and knowingly failed to disclose that she was working to SSA with the intent to fraudulently secure benefits when no benefits were due. As a result of this, Brown received and converted to her own use \$27,936 in disability benefits from SSA that were not due to her. Such conduct violates 18 U.S.C. § 641.

5. The defendant agrees that the defendant committed all the essential elements of the offense. This factual resume is not intended to be a complete accounting

of all the facts and events related to the offense charged in this case. The limited purpose of this statement of facts is to demonstrate that a factual basis exists to support the defendant's guilty plea to Count One of the indictment.

AGREED TO AND STIPULATED on this 8 day of January 2019.

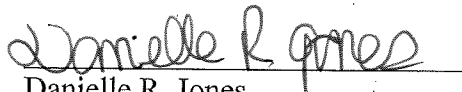


Lisa Brown
Defendant



Brook Antonio
Attorney for Defendant

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